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6 NORTH AMERICAN TITLE INSURANCE COMPANY

7 DESIGNATED LOCAL COUNSEL FOR SERVICE

7 PER L.R. IA 11-1(b)

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 BANK OF AMERICA, N.A.,

Case No.: 2:21-cv-00584-KJD-NJK

13 Plaintiff,

STIPULATION TO STAY CASE

14 vs.

15 NORTH AMERICAN TITLE INSURANCE
16 COMPANY,

17 Defendant.

18
19 Defendant North American Title Insurance Company (“NATIC”), on the one hand, and
20 plaintiff Bank of America, N.A. (“BANA”), on the other hand, hereby stipulate and agree as
21 follows:

22 This is one of many actions pending before the Nevada state and federal courts involving a
23 Lender’s alleged entitlement to coverage under a title insurance policy following an HOA
24 foreclosure sale. BANA filed this specific action in Nevada’s Eighth District Court on April 8,
25 2021;

26 NATIC removed this case to the United States District Court on April 9, 2021.
27 The parties have since engaged with one another about the possibility of settling this and other
28 similarly situated matters involving these specific parties. Due to the number of claims involved,

1 the parties anticipate it may take several months to complete negotiations. In order to preserve
2 resources during this process, the parties stipulate and agree that this matter should be stayed.

3 **NOW THEREFORE**, BANA and NATIC hereby **STIPULATE** and **AGREE** as follows:

4 1. This action shall be **STAYED**;
5 2. Either Party may move to lift this stay at any time.
6 3. The Parties shall provide the District Court with a joint status update regarding the
7 status of their settlement negotiations ninety (90) days after entry of the order on this
8 stipulation.

9 Dated: April 14, 2021

10 SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair

12 KEVIN S. SINCLAIR
13 Attorneys for Defendants
14 NORTH AMERICAN TITLE INSURANCE
15 COMPANY

16 Dated: April 14, 2021

17 WRIGHT, FINLAY & ZAK, LLP

18 By: /s/-Darren T. Brenner

19 DARREN T. BRENNER
20 Attorneys for Plaintiff
21 BANK OF AMERICA, N.A.

22 **IT IS SO ORDERED.**

23 Dated this _____ day of _____, 2021.

24 _____
25 KENT J. DAWSON
26 UNITED STATES DISTRICT JUDGE
27
28